

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Adv. Pro. No. 10-04680 (SMB)

CHALEK ASSOCIATES LLC; MORTON J.  
CHALEK, in his capacity as Managing Member of  
Chalek Associates LLC and as Trustee for the Trust  
of Doris Chalek; TRUST OF DORIS CHALEK, in  
its capacity as a Member of Chalek Associates LLC;  
FRANCES REISS, in his/her capacity as a Member  
of Chalek Associates LLC; RICHARD M.  
CHALEK, in his capacity as a Member of Chalek  
Associates LLC; DAVID CHALEK, in his capacity  
as a Member of Chalek Associates LLC; ISABEL  
CHALEK, in her capacity as a Member of Chalek  
Associates LLC; MITCHEL CHALEK, in his  
capacity as a Member of Chalek Associates LLC;  
JESSICA DECKER, in her capacity as a Member of  
Chalek Associates LLC; JOHN TZANNES, in his  
capacity as a Member of Chalek Associates LLC;  
PETER TZANNES, in his capacity as a Member of  
Chalek Associates LLC; and ROBIN TZANNES, in  
his/her capacity as a Member of  
Chalek Associates LLC,

Defendants.

**[PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE**

Upon the application (the “Application”) dated March 2, 2018, brought by Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, which has been substantively consolidated with the estate of Bernard L. Madoff, seeking an entry of an order (the “Order”) dismissing the above-captioned adversary proceeding with prejudice, and it appearing that due and sufficient notice of the Application has been given under the circumstances, and it further appearing that the relief sought in the Application is appropriate based on the information provided in the Application, and it further appearing that this court has jurisdiction to consider the Application and the relief requested therein pursuant to 28 U.S.C. §§ 1334(b) and 157(a), and after due deliberation, and sufficient cause appearing therefor; it is hereby

ORDERED that the Application is granted; and it is further

ORDERED that all claims in the above-referenced adversary proceeding are DISMISSED WITH PREJUDICE.

Dated: New York, New York  
\_\_\_\_\_, 2018

---

HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE